

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	CASE No. 1:20-MJ- <u>160</u>
)	
ALEXANDER JARRETT DAVIS,)	
)	
Defendant.)	

AFFIDAVIT IN SUPPORT OF A CRIMINAL INFORMATION AND A SUMMONS

I. INTRODUCTION

I, Special Agent Paul Lawless, of the Naval Criminal Investigative Service (NCIS), Marine Corps Base Quantico, Virginia, having been duly sworn, state the following:

1. I am a Special Agent with the NCIS, and have served in this position from April 2018 to the present. Previously, from March 2012 to April 2018, I served as a Criminal Investigator for the United States Marine Corps Criminal Investigation Division. I am currently assigned to NCIS Resident Agency Quantico, Virginia. My duties and responsibilities include the investigation of violations of federal law and the Uniform Code of Military Justice by both military and civilian personnel, to include investigations regarding financial fraud. By virtue of my NCIS employment, I perform a variety of investigative tasks, including functioning as a case agent on investigations regarding financial fraud and crimes against persons.

2. I have received training in how to conduct criminal investigations, interviewing and interrogation techniques, the execution of military search authorities and federal search warrants and seizures, and the identification and collection of evidence.

3. This affidavit is submitted in support of a summons to compel the appearance of ALEXANDER JARRETT DAVIS, to answer the charge that from on or about June 1, 2019, to on or about August 15, 2019, within the Eastern District of Virginia, he embezzled, stole, purloined, and knowingly converted to his use approximately \$22,502.00, belonging to the United States, in violation of Title 18, United States Code, Section 641.

4. I personally investigated the violations described herein. I learned the facts set forth below from my own investigation and interviews, and from other government employees and witnesses cited here. This affidavit includes only the information necessary to support probable cause for a summons to be issued in this case. It does not include each and every fact known to me or the government.

II. THE NATURE OF THE OFFENSE

5. On June 6, 2019, Citibank contacted a United States Marine Corps officer ("Marine-1"), regarding a suspicious charge on Marine-1's government-issued travel credit card. Marine-1 was not in physical possession of the card, as he had previously relinquished it to DAVIS as part of Marine-1's retirement from the military. DAVIS was a Marine Corps reservist assigned to Marine Corps Systems Command ("MCSC") at Marine Corps Base Quantico, Virginia, who had been given administrative credentials for the processing of GTCC claims and applications for new cards.

6. Upon learning of the suspicious charge, a civilian employee at MCSC asked DAVIS what had happened to the card. DAVIS told this employee that he, DAVIS, had destroyed it.

7. The June 2019 statement for the government credit card previously issued to

Marine-1 shows a transactions on June 5 and 6, 2019 to “Venmo”ⁱ for approximately \$2,163.00.

8. Additionally, on August 22, 2019, NCIS was notified by the travel administrator from MCSC of suspected fraudulent activity involving DAVIS. The travel administrator reported that DAVIS was suspected of fraudulently utilizing his own GTCC and that he had obtained an additional fictitious GTCC in the name of “JOE BLACK”.

9. Records checks revealed that from June 2019 to August 2018 DAVIS utilized his issued GTCC for \$9,998.88 in total charges not associated with travel for his government job, to include several cash payments to himself though “Venmo” and “PayPal”.


10. Documentation provided to NCIS from the travel administrator at NCIS also showed that an application for a fictitious MCSC employee named “JOE BLACK” had been submitted and approved by DAVIS utilizing his home address in Fredericksburg, Virginia. Records from June 2019 to August 2018 show that DAVIS utilized this fictitious GTCC for approximately \$10,340.45 in total charges to include several cash payments to himself though “PayPal”.

11. DAVIS approved Department of Defense funds for the fraudulent charges for both his own GTCC, Marine-1’s card, and the fraudulent GTCC in the name of “JOE BLACK” by having the fraud alerts sent to his work email and approving them on behalf of MCSC with his administrative credentials.

12. On October 9, 2019, DAVIS was interviewed by NCIS and admitted to opening a fraudulent GTCC in the name of “JOE BLACK,” and using it with his own GTCC and that of Marine-1 to make several thousand dollars in unauthorized purchases.

III. CONCLUSION

Based on the foregoing, I submit that there is probable cause to believe that from on or about June 1, 2019 to on or about August 15, 2019, within the Eastern District of Virginia, ALEXANDER JARRETT DAVIS embezzled, stole, purloined, and knowingly converted to his use approximately \$22,502.00, belonging to the United States, in violation of Title 18, United States Code, Section 641.


Paul Lawless
Special Agent, NCIS
Marine Corps Base Quantico, Virginia

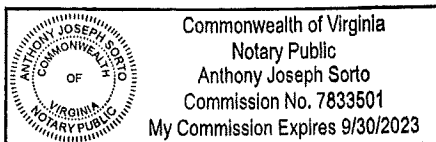
Sworn and subscribed before me

this ~~19th~~ day of ~~May~~ 2020

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June





ⁱ Venmo and PayPal are peer-to-peer electronic payment applications where cash advances to an individual may be made by charging the amount against a credit or debit card account.